

THE HONORABLE JOHN H. CHUN

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF WASHINGTON  
AT SEATTLE

AMAZON.COM, INC., a Delaware  
corporation; and AMAZON.COM SERVICES  
LLC, a Delaware limited liability corporation,

Plaintiffs,

v.

Individuals and entities doing business as the  
Amazon Brand Registry Account VIVCIC; and  
DOES 1-10,

Defendants.

Case No.: 2:23-cv-00486-JHC

**[PROPOSED] ORDER GRANTING  
PLAINTIFFS' *EX PARTE* MOTION FOR  
EXPEDITED DISCOVERY**

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CASE NO.: 2:23-CV-00486-JHC

FENWICK & WEST LLP  
401 UNION ST., 5TH FLOOR  
SEATTLE, WA 98101

THIS MATTER came before the Court on Plaintiffs Amazon.com, Inc. and Amazon.com Services LLC (“Plaintiffs”) Motion for Expedited Discovery (“Motion”). The Court has considered Plaintiffs’ Motion, supporting declarations, and the governing law. Accordingly, it is hereby ORDERED:

Plaintiffs’ Motion for Expedited Discovery is **GRANTED** as follows.

Plaintiffs are granted leave, prior to the Rule 26(f) conference, to serve Rule 45 subpoenas to obtain information regarding Defendants’ true identities, locations, and the scope of the alleged counterfeiting scheme from (1) Wells Fargo Bank, N.A.; (2) Deutsche Bank Trust Company Americas; (3) First Century Bank, N.A.; (4) Payoneer Global Inc.; (5) PingPong Global Solutions Inc.; (6) LianLian Pay Corporation; and (7) any email service providers that are linked with the Defendants. To the extent Plaintiffs identify additional third parties in subpoena responses as having responsive information related to the identity or location of Defendants or other bad actors responsible for the fraudulent takedown scheme alleged in the Complaint, Plaintiffs will seek leave from the Court to serve additional Rule 45 subpoenas on those third parties.

**IT IS SO ORDERED** this \_\_\_\_\_ day of \_\_\_\_\_, 2023.

\_\_\_\_\_  
HONORABLE JOHN H. CHUN  
UNITED STATES DISTRICT JUDGE

Presented by:

FENWICK & WEST LLP  
*Attorneys for Plaintiffs*

s/ Brian D. Buckley

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